

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:)	MDL No. 16-2738 (FLW) (LHG)
)	
PAULETTE BONDS,)	
)	
Plaintiff,)	Case No. 3:19-cv-05643-FLW-LHG
)	
v.)	
)	
JOHNSON & JOHNSON, et al.,)	
)	
Defendants.)	

**LTL DEFENDANTS' CROSS-NOTICE OF VIDEOTAPED TRIAL PRESERVATION
DEPOSITION OF PAULETTE BONDS AND SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that pursuant, the undersigned counsel for the LTL Defendants¹ hereby cross-notices in this matter the deposition of **Paulette Bonds** to Plaintiff's Notice to Take Videotaped Trial Preservation Deposition dated November 5, 2021, served in *Paulette Bonds v. Johnson and Johnson, et al, 3:19-cv-05643* (attached hereto as Exhibit 1).

The deposition will take place on **November 11, 2021, beginning at 1:00 p.m. CST, via video Conference** (link provided to Counsel prior to deposition). The deposition will proceed upon examination pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a Notary Public or some other officer authorized by law to administer oaths. The name and address of the

¹ LTL Management LLC, a North Carolina limited liability company ("LTL"), filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of North Carolina. Defendant Johnson & Johnson Consumer Inc. ("Old JJCI"), following a corporate restructuring completed on October 14, 2021, ceased to exist and a new entity named Johnson & Johnson Consumer Inc. ("New JJCI") was created as part of the same restructuring. As a result of the restructuring, LTL is now responsible for the talc-related claims asserted against Old JJCI, New JJCI, and Johnson & Johnson (collectively, the "LTL Defendants").

company expected to do the video recording is Golkow Litigation Services, One Liberty Place, Suite 5150, Philadelphia, PA 19103, (877) 370-3377. The deponent shall produce, at the deposition, any of the documents and tangible things listed on Exhibit A that are in her possession, custody, and control.

DATED: November 10, 2021

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

s/Susan M. Sharko

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Attorneys for LTL Defendants

EXHIBIT A

1. To the extent not previously provided, all diaries, personal calendars, notebooks, handwritten notes or other materials kept in your possession that related to your exposure to Johnson's® Baby Powder and Shower to Shower®;
2. Any Johnson's® Baby Powder or Shower to Shower® containers or packaging, as well as any remaining product, in your possession;
3. Receipts or any other documents reflecting your purchase or acquisition of Johnson's Baby Powder and Shower to Shower®;
4. Receipts or any other documents reflecting your purchase or acquisition of any other personal care powder product;
5. To the extent not previously provided, all medical or other records relating to you that are in your possession, that were not previously provided;
6. To the extent not previously provided, documents or materials reflecting research that you have conducted or materials you have gathered regarding talc and ovarian cancer including, but not limited to, electronic materials, photocopied material, books, material printed from the Internet, recordings, newsletters, newspapers, or other print media;
7. To the extent not previously provided, all literature, newspapers or magazine articles, letters, booklets, brochures, pamphlets, written directives, and written material authored or collected by you, or supplied to you from any source including, but not limited to persons, firms, corporations, or governmental entities, regarding (1) Johnson's® Baby Powder, (2) Shower to Shower® (3) your alleged injuries, and/or (4) any Defendant;

8. To the extent not previously provided, the names, addresses and telephone numbers of persons who may have observed or recorded any events or observations pertaining to the allegations of this lawsuit;

9. To the extent not previously provided, all documents that substantiate your claims for damages; and

10. Documents or tangible items reviewed by you in preparation for your deposition.

Exhibit - 1

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION

Civil No. 3:16-md-2738-FLW-LHG

This document relates to:
Paulette Bonds v. Johnson & Johnson, et al.
Case No. 3:19-cv-05643-FLW-LHG

NOTICE TO TAKE VIDEOCONFERENCE
VIDEOTAPED TRIAL PRESERVATION DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rule 30 of the *Federal Rules of Civil Procedure*, and pursuant to the MDL In Extremis Deposition Protocol dated January 23, 2017, the oral and videoconference videotaped deposition of Plaintiff, **PAULETTE BONDS**, will be taken before a person authorized to administer the oath. As per agreement of all parties, the oath will be administered over videoconference and the identity of the witness stipulated on the record. This videoconference deposition will be videotaped and recorded for use at trial and counsel are specifically informed that Plaintiff's health is declining such that she may not be available or capable to attend trial; therefore, this deposition is intended to preserve her testimony for use before the jury. The taking of said deposition may be adjourned from day to day until completed.

DATE & TIME OF DEPOSITION: **November 11, 2021 1:00 p.m. CT**

LOCATION: **Via Video Conference (link to be provided to Counsel prior to deposition)**

COURT REPORTER: **Golkow Litigation Services
One Liberty Place, Suite 5150
Philadelphia, PA 19103
(877) 370-3377**

Dated: November 5, 2021

Respectfully submitted,

/s/ Jennifer K. Emmel

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2021, a copy of the foregoing Notice of Deposition was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Jennifer K. Emmel

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